Standard Process Inc.

2018 Green Tier Annual Report

(September 2017 – August 2018)

GREEN TIER

Wisconsin Department of Natural Resources

Our Mission

Standard Process is the visionary leader in whole food nutrient solutions. We apply systems thinking to holistic nutrition that empowers practitioners to transform lives.

Our Corporate Values

Standard Process demonstrates commitment to the Whole:

Person	Product	Process	Planet	Posterity
By fostering the physical, emotional, intellectual, and spiritual health of customers and employees	By emphasizing the importance of concentrated whole food ingredient sources and herbs in the product line	By ensuring the highest quality in every stage of development, from farming through shipping	By utilizing environmentally safe farming, manufacturing, and business practices	By preserving and strengthening the company for all future generations

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Executive Summary

In recognition of our long tradition of commitment to the environment, along with our continued commitment to expand our environmental and sustainability efforts, Standard Process was accepted into the Wisconsin Department of Natural Resources Green Tier Program on August 21, 2014. As part of the Green Tier application process, we committed to continue compliance with applicable rules and regulations; continue organic farming practices; implement a formal Environmental Management System (EMS); expand beneficial reuse, waste reduction and recycling efforts; and identify and implement opportunities for additional energy conservation/reduction measures.

During the past year, our fourth year in the Program, we continued with our ongoing reduce, reuse, and recycling efforts as well as our organic farming practices, and also expanded our energy and environmental sustainability efforts. Following are some of the recent Green Tier related highlights. Additional detail is provided in the main body of this report.

- **67,000 kWh/yr** additional **electrical reductions** completed in 2017 (32 additional metric tons CO2e reductions/yr)
- **5,300 therms/yr** additional **natural gas reductions** completed in 2017 (29 additional metric tons CO2e reductions/yr)
- Completed **boiler efficiency evaluation** which showed **potential to reduce natural gas usage by 10 to 15%**. Working with Production and Maintenance on implementation of the plan.
- **1,400,000 gal/yr** (annualized rate) of **water use and wastewater generation issues** identified and **addressed** over the past year.
- **4,500,000 lb** (est.) byproduct vegetable **solids composted** in 2017.
- **250 tons** of **compost** (produced from our vegetable solids) **used** as soil amendment on the organic farm in 2017.
- Initiated **Byproduct Solids Waste Reduction** project. Potential to **eliminate landfilling of 15 to 18 tons per year** of byproduct soft gel material.
- Significant (approximately **40%**) **reduction** in reported **air emissions** as a **direct result of** departmental meetings on **Green Tier** and Sustainability.
- Initiated **Paper Reduction project** to reduce use of office paper through education and awareness. Well received by employees. **Very positive** preliminary **results**.

Following is an update on some of the significant energy/environmental gains that have been made over the past few years. These gains are measured and benchmarked to production level data:

- **5.9% reduction in electrical usage** per bottle packaged since 2011.
- **23.3% reduction in electrical usage** per work order since 2011.
- **4.9% reduction in natural gas usage** per bottle packaged since 2011.
- **22.7% reduction in natural gas usage** per work order since 2011.
- **9% reduction in water usage** per work order since 2011.

Additional detail is provided in the body of this **2018 Green Tier Annual Report**.

1.0 Introduction

Standard Process has a long history and tradition of commitment to sustainability and the environment. In August 2014 we were accepted into the Wisconsin Department of Natural Resources (DNR) Green Tier program as a direct result of our commitment to the environment and our superior environmental performance. The Green Tier program recognizes companies that distinguish themselves as environmental innovators and demonstrate a strong commitment to the environment and sustainability beyond simply maintaining a good environmental compliance record. By accepting us into the Green Tier Program, the State of Wisconsin recognized the significant environmental and sustainability efforts we have already taken and our overall commitment to continuing to expand and focus on those efforts.

This report provides an update on our goals and accomplishments through our fourth year in the Program.

2.0 EMS Audit Report

Standard Process retained Perfect Environmental Performance (PEP) in April 2018 to perform the external compliance audit of our EMS, which is required every three years. The intent of the external audit is to confirm that we are using our EMS to produce "superior environmental performance". **No major or minor non-conformities** were identified during the **2018 audit**. A copy of the official Letter of Conformance from PEP is included in the Appendix of this report. The letter indicates that:

"The evidence provided during the EMS audit process demonstrated to PEP that the Standard Process EMS conforms to the "functional equivalency" requirements of ss. 299.83. PEP also found that the EMS continues to be functionally equivalent to ISO 14001:2004, that the EMS is a tool used to produce superior environmental performance and that the EMS incorporates continual improvement."

3.0 Progress on Commitments

As part of the Green Tier application process, Standard Process was able to highlight its long tradition of dedication to the environment and committed to continue its focus on the following specific items:

- Continuing compliance with applicable rules and regulations
- Continuing organic farming practices
- Implementing a formal Environmental Management System
- Expanding beneficial reuse, waste reduction and recycling efforts
- Identifying and implementing opportunities for additional energy conservation/reduction measures

The following sections of this report provide updates on these commitments.

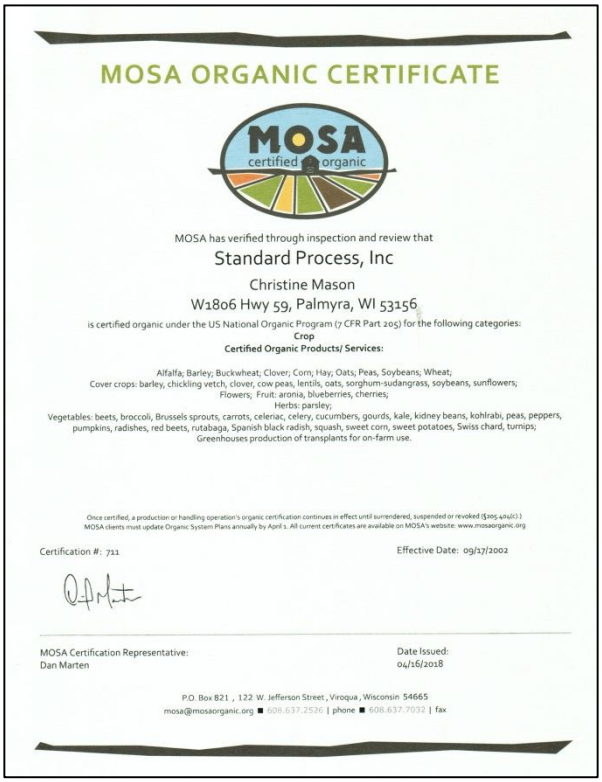
3.1 Compliance with Applicable Rules and Regulations

Standard Process has a long history of good standing with regulatory agencies, as exhibited by our acceptance into the Green Tier Program. No regulatory issues, notices of noncompliance, or other compliance issues were identified throughout the past Green Tier Reporting year. We continue to work closely with our Green Tier contact, Renee Bashel, and other DNR personnel to help assure that we remain in good standing with the Department and continue to remain in compliance with all applicable rules and regulations.

Annual environmental reports for the 2017 reporting year were all filed as required by their submittal deadlines. Data is being compiled throughout 2018 in preparation for the annual reports that will be due in early 2019.

3.2 Organic Farming Practices

Standard Process is proud of our certified organic farm. We continue to remain in good standing with Midwest Organic Service Association (MOSA):



MOSA ORGANIC CERTIFICATE

MOSA certified organic

MOSA has verified through inspection and review that

Standard Process, Inc

Christine Mason

W1806 Hwy 59, Palmyra, WI 53156

is certified organic under the US National Organic Program (7 CFR Part 205) for the following categories:

Crop

Certified Organic Products/ Services:

Alfalfa; Barley; Buckwheat; Clover; Corn; Hay; Oats; Peas, Soybeans; Wheat;
Cover crops: barley, chickling vetch, clover, cow peas, lentils, oats, sorghum-sudangrass, soybeans, sunflowers;
Flowers; Fruit: aronia, blueberries, cherries;
Herbs: parsley;
Vegetables: beets, broccoli, Brussels sprouts, carrots, celeriac, celery, cucumbers, gourds, kale, kidney beans, kohlrabi, peas, peppers, pumpkins, radishes, red beets, rutabaga, Spanish black radish, squash, sweet corn, sweet potatoes, Swiss chard, turnips;
Greenhouses production of transplants for on-farm use.

Once certified, a production or handling operation's organic certification continues in effect until surrendered, suspended or revoked (§205.404(c).)
MOSA clients must update Organic System Plans annually by April 1. All current certificates are available on MOSA's website: www.mosaorganic.org

Certification #: 711

Effective Date: 09/17/2002

MOSA Certification Representative:
Dan Marten

Date Issued:
04/16/2018

P.O. Box 821 , 122 W. Jefferson Street , Viroqua , Wisconsin 54665
mosa@mosaorganic.org ■ 608.637.2526 | phone ■ 608.637.7032 | fax

As an organic certification agency, MOSA is regulated by the National Organic Program (NOP) of the United States Department of Agriculture (USDA).

Additional detail on our organic farming practices can be found on our website at:

https://www.standardprocess.com/About-Us/Organic-Farming

3.3 Implementation of a Formal Environmental Management System (EMS)

During our first year in the Green Tier program, we successfully developed and implemented a formal Environmental Management System (EMS) that is equivalent in function and scope to an ISO 14001 EMS. During the past Green Tier Reporting Year, we completed our first three-year external compliance audit of the EMS since implementation. A copy of the official Letter of Conformance from Perfect Environmental Performance (PEP) is included in the Appendix of this report.

We continue to expand and improve the EMS as appropriate to help us continue with our environmental and sustainability commitment and efforts.

3.4 Beneficial Reuse, Waste Reduction, and Recycling

As discussed in previous annual reports, beneficial reuse, waste reduction, and recycling are an integral part of everyday operations at Standard Process. Programs have been in place for 25+ years at this facility for common recyclables such as paper, cardboard, glass, metal, plastics, as well as for used oil, print cartridges, electronics, and batteries. In addition to continuing with the established procedures, as discussed in Section 4 of this report, we continue to identify and implement new and expanded measures to further reduce, reuse, and recycle.

Beneficial reuse of byproduct solids has also been, and continues to be, an important part of our operations. This is further discussed in Section 4.4 of this report. Our byproduct plant solids are currently being composted and used to amend and improve soil structure, water holding capacity, and soil fertility. We are working to identify and implement additional programs to further expand reuse of our byproduct materials.

3.5 Energy Conservation and Reduction

Efficient use of energy has also been an important aspect of operations at Standard Process for many years. Section 4 of this report provides information on our most recent projects and the benefits of our overall energy conservation efforts.

4.0 Environmental Performance/Sustainability Metrics

Our commitment to the environment and sustainability predates our acceptance into the Green Tier program. Our historical efforts have limited the potential for additional significant incremental improvements each year; however, the cumulative benefits of our past improvements continue to compound each year.

Over the past Green Tier year we have continued to review and focus on improvements in electric, natural gas, and water usage, as well as wastewater generation. Information on these efforts is summarized in the following Sections of this report.

4.1 Electricity

Over the past year, we continued to focus on upgrades to more efficient lighting within the plant and office as part of our ongoing ***Objective*** to implement energy conservation practices. More than **500 energy efficient LED lamps were installed** to replace existing less efficient lamps. A summary of the estimated electrical and associated CO2 equivalent reductions implemented in 2017 are included in Table 4-1:

Table 4-1: Additional Electrical and CO2e Reductions (CY 2017)

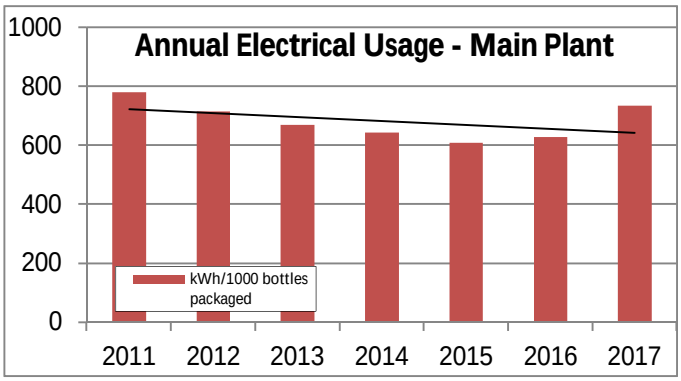
Project Type	**Electrical Reduction** (kWh/yr)	**CO2 Equivalent Reduction** (metric tons/yr)
Lighting	67,000	32
Total Reductions (2017)	**67,000**	**32**

Table 4-2 and the associated graph provide an updated summary of annual electrical usage at the Main Plant per bottle packaged. As shown, there was an increase in electrical usage per bottle packaged over the past year; however, total **electrical usage per bottle packaged is still nearly 6% less than it was in 2011**. This is a significant reduction, and is a direct result of energy reduction programs that have been implemented over the past several years.

Table 4-2: Electrical Usage per Bottle Packaged (Main Plant)

Year	**Electrical Usage** (kWh/1000 bottles)
2017	735
2016	630
2015	609
2014	644
2013	670
2012	716
2011	781

% Change	
2016 to 2017	16.7%
2015 to 2016	3.4%
2014 to 2015	-5.4%
2013 to 2014	-4.0%
2012 to 2013	-6.4%
2011 to 2012	-8.3%
2011 to 2017	**-5.9%**



While the recent increase in electrical usage per bottle packaged is likely due to many factors, it appears that a production decision over the past year to run smaller batch sizes has had the biggest impact on this increase. Smaller batches (more work orders) require more change-overs and cleaning cycles to produce the same amount of product. This is likely the main cause of the increase in the amount of electricity used per pound of material produced over the past year.

For comparison, as shown in Table 4-3, normalizing **electrical usage to the number of work orders** (batches) shows a **19% reduction** over the past year, and a total reduction per work order of over **23% since 2011**.

Table 4-3: Electrical Usage per Work Order (Main Plant)

Year	**Electrical Usage** (kWh/Work Order)
2017	14,256
2016	17,627
2015	16,230
2014	15,669
2013	17,680
2012	16,934
2011	18,586

% Change	
2016 to 2017	-19.13%
2015 to 2016	8.61%
2014 to 2015	3.58%
2013 to 2014	-11.37%
2012 to 2013	4.41%
2011 to 2012	-8.89%
2011 to 2017	**-23.3%**

4.1.1 Farm Lighting/Occupancy Sensors Initiative – An additional ***Target*** was established over the past year to evaluate and implement potential lighting upgrades at the SP Farm as part of the ***Energy Reduction Objective***. A review of the Farm operations was conducted with WE Energies and Focus on Energy personnel. One of the projects identified and approved in the 2018 budget is to **install occupancy sensors** in the main Farm Production (Juicing) building. The units will be installed this year and will reduce overall electrical usage at the Farm. Additionally, LED lighting upgrades are made at the Farm operations as existing lighting fails. Replacing existing fluorescent lamps with LED lamps **reduces energy consumption by 50%** per fixture.

4.2 Natural Gas

Natural gas reductions in 2017 were primarily related to identifying and correcting hot water leaks within the facility. The estimated natural gas and CO2e reductions associated with elimination of hot water leaks is summarized in Table 4-4:

Table 4-4: Additional Natural Gas and CO2e Reductions (CY 2017)

	Natural Gas Reduction (therms/yr)	**CO2 Equivalent Reduction** (metric tons/yr)
Natural Gas Reductions	**5,330**	**29**

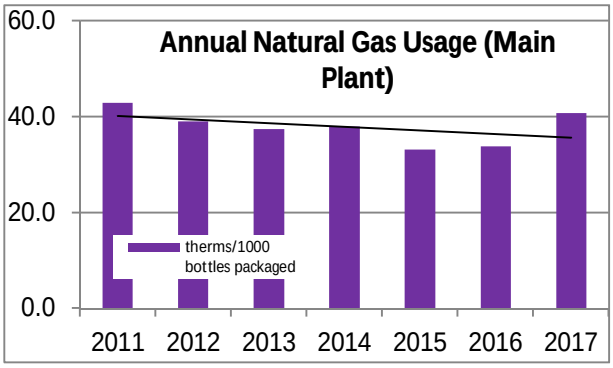
We also received **Focus on Energy rebates** for upgrading **3 rooftop HVAC units** with more efficient units. The total energy reductions associated with these units were not quantified or included in this report.

As with electrical usage, we used the bottles packaged metric to monitor and quantify natural gas usage. This is consistent with previous reports. Table 4-5 and the associated graph provide a summary of annual natural gas usage at the Main Plant per bottle packaged. As shown, similar to electrical usage, there was an increase in natural gas usage per bottle packaged last year. Despite this increase, natural gas usage has a **cumulative reduction of nearly 5% per bottle packaged since 2011**. This is a significant reduction and is a direct result of our energy reduction efforts over the past several years.

Table 4-5: Natural Gas Usage per Bottle Packaged (Main Plant)

Year	Natural Gas Usage (therms/1000 bottles)
2017	40.8
2016	33.9
2015	33.1
2014	38.0
2013	37.5
2012	39.1
2011	42.9

% Change	
2016 to 2017	20.29%
2015 to 2016	2.25%
2014 to 2015	-12.73%
2013 to 2014	1.28%
2012 to 2013	-4.13%
2011 to 2012	-8.89%
2011 to 2017	**-4.91%**



The decision to run smaller batch sizes, discussed in the electrical usage section, also applies to the increased use of natural gas per bottle packaged over the past year. As shown in Table 4-6, there was also a **huge reduction in natural gas usage** per work order (batches) over the past year (**16.7%**), and a total reduction per work order of nearly **23% since 2011**.

Table 4-6: Natural Gas Usage per Work Order (Main Plant)

Year	Natural Gas Usage (kWh/Work Order)
2017	790
2016	948
2015	883
2014	925
2013	989
2012	925
2011	1,022

% Change	
2016 to 2017	-16.68%
2015 to 2016	7.40%
2014 to 2015	-4.49%
2013 to 2014	-6.49%
2012 to 2013	6.92%
2011 to 2012	-9.51%
2011 to 2017	**-22.7%**

4.2.1 Boiler Efficiency Initiative – Another one of the ***Targets*** established within our ***Energy Reduction Objective*** was to evaluate the potential to reduce natural gas usage (and associated air emissions) through improved management of our boiler system. The larger, older, less efficient of the two main boilers at the Main Plant has historically been used as the primary boiler. An evaluation of alternative operating scenarios determined that a significant opportunity for energy reduction and cost savings is possible by making use of the smaller, newer, more efficient of the two boilers as the main boiler throughout the majority of the year (the smaller boiler does not have the capacity to handle the full load during isolated periods of extremely cold weather). It is estimated that a **10 to 15% reduction in natural gas usage** (**50,000 to 80,000 therms per year** and associated significant cost savings) could be achieved by taking advantage of the higher efficiency. Operations has indicated that they intend to begin using the more efficient boiler as the lead boiler. This change has not yet been implemented, and therefore, it is not reflected in the data used for this report. We anticipate that the impact on energy reduction of this change should be reflected in the Green Tier report next year.

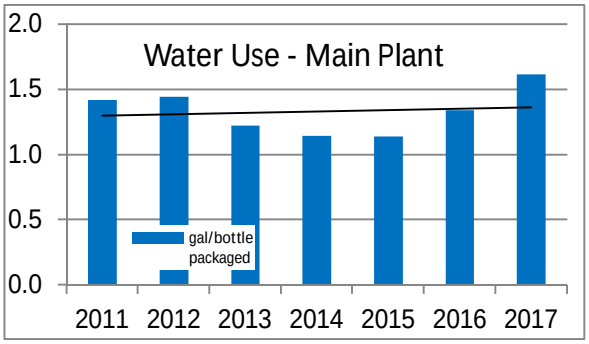
4.3 Water and Wastewater

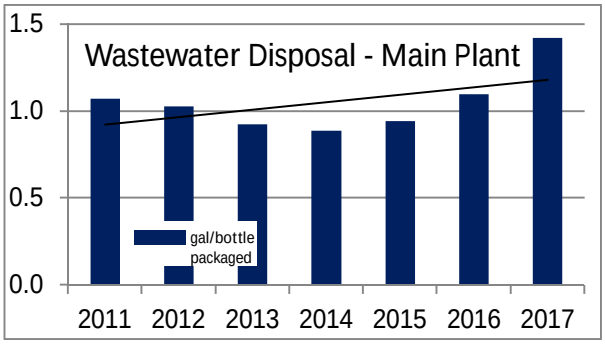
Over the past year, we continued to work to identify and address water usage/wastewater generation sources and related issues through site reviews and other methods. This included identifying and addressing several water and wastewater related issues. Following is a summary of some of the water and wastewater items identified and addressed:

- Identified faulty blowdown valves on the water tank serving several condensing towers. These failed valves allowed continuous flow from the tank to the sewer, and required constant makeup water to the system, even when the towers were not using water as a cooling media. The **annualized leakage rate** associated with this source was estimated at approximately **750,000 gallons per year**.
- Several foot foamers were identified in production areas with continuous leakage of water and chemicals to the sewer system. The **annualized leakage rate** from these units was measured at approximately **360,000 gallons per year**.
- Several hose leaks were also identified throughout the past year. The **annualized leakage rate** associated with these assorted leaks was approximately **270,000 gallons per year**.

Elimination of these items addressed approximately **1.4 million gallons per year** (annualized rate) of potential **excess water usage and wastewater generation**.

Despite the focus on water and wastewater reduction measures over the past few years, the change to smaller batch sizes/more work orders has also impacted the water use and wastewater generation per bottle packaged. As shown in the following graphs, both parameters show an increasing trend based on bottles packaged:



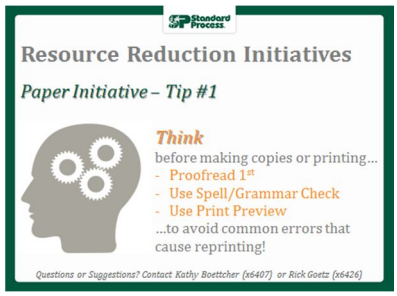


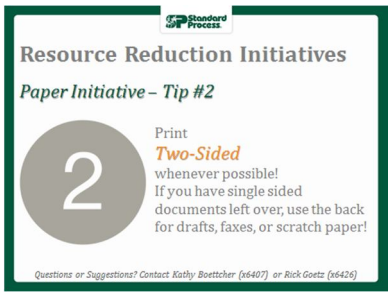
While several factors likely impact water usage and wastewater generation rates, it is likely that the shift to smaller batch sizes has had the biggest impact on this increasing trend because smaller batch sizes means more work orders, which results in more water usage due to an increase in the number of cleaning cycles required to produce the same amount of product. Normalized **water usage per work order** showed a **reduction of about 9%** between 2011 and 2017.

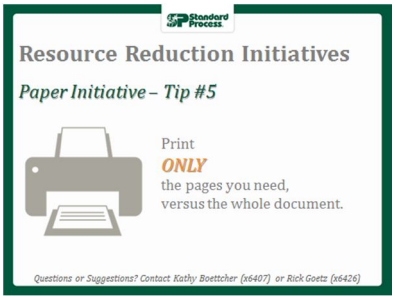
4.4 Solid Waste and Raw Materials

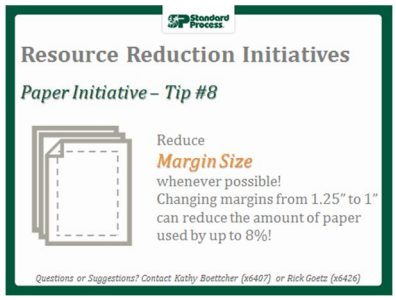
4.4.1 Composting - It is estimated that approximately **4.5 million pounds of byproduct vegetable solids** were beneficially reused to produce **compost** in 2017. This operation makes beneficial reuse of a valuable byproduct and also eliminates the need for alternative disposal of these materials. **Nearly 250 tons of compost, produced from the vegetable solids,** was applied as a beneficial **soil amendment to our farm fields** in 2017. These materials improve soil quality at the farm headquarters and reduce the amount of additional soil amendments purchased, while eliminating the need for alternative disposal of a valuable resource.

4.4.2 Paper Reduction Initiative - Over the past Green Tier year, we began an initiative (***Objective and Target***) to reduce the amount of office paper used for printing and copying. Preliminary observations indicated an opportunity for resource reductions and cost savings through minor modifications and general awareness training. One of the tools used for this initiative was presentation of specific potential reduction tips on the employee informational screens throughout the plant. A few examples of individual slides are presented below. Several of the **tips are reflected in the format of this report** (smaller margins, smaller font, two-sided printing of paper copies, and electronic submittal/sharing).









Additional efforts included working with individual groups on specific ideas for paper reduction and working with the IT group to modify settings on specific printers to default to double sided in lieu of single sided printing.

This initiative has been **well received** as evidenced by feedback from various plant and office personnel who have expressed support and interest in the project. While specific measurement of the success of this initiative is somewhat difficult due to many factors that affect paper usage, some of the specific successes that have been achieved as a direct result of the paper reduction initiative are summarized below:

- As shown in one of the slides above, **Accounting** made several changes within their department that resulted in a **reduction of 12 to 14 reams of paper per year**. (Departmental paper reduction efforts are displayed as part of the paper reduction initiative on the informational screens throughout the plant.)
- In direct response to the paper reduction initiative, **Human Resources** worked to reduce the new employee orientation packet from 18 sheets down to just one sheet. This reduced the amount of paper used for this process from 1,300 sheets of paper per year down to just 72. That is a **reduction of well over two reams of paper per year**.
- The **Solid Dose Department** began storing one of their data sheets electronically (that were previously printed and stored as hard paper copies). That is a **reduction of more than a ream of paper each year**.
- The **Environmental** Group has consistently been making two sided copies or printing on the backside of old paper whenever possible. Just one of the Environmental tasks, budget tracking, was shown to save about 30 pages of paper per month or about ¾ **of a ream of paper per year** with these measures.

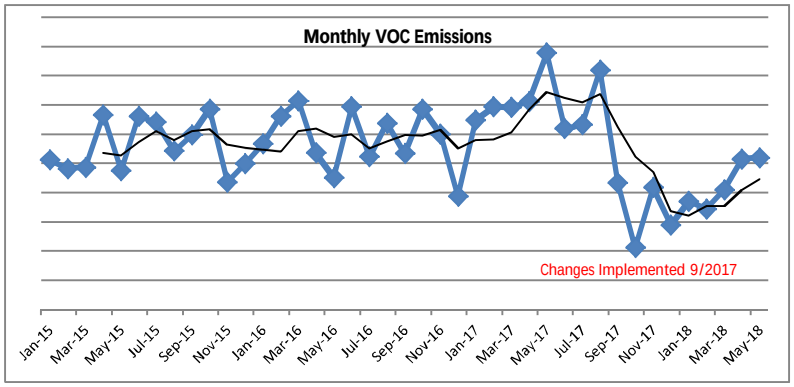
4.4.3 Byproduct Solids Waste Reduction – An ***Objective*** was established in 2017 to minimize the amount of waste generated from soft gel operations. A ***Target*** was set to reduce or **eliminate landfilling of byproduct webbing** from the soft gel operation. An extensive search was conducted for options to eliminate disposal of this material. Ultimately, a rendering facility was identified that can process the material into useful products for pet food, soaps, biodiesel, cosmetics, etc. We are in the process of finalizing the internal collection and handling procedures to facilitate this reclaim of materials. Ultimately this will result in **elimination of 15 to 18 tons of waste material per year**.

During the soft gel project, the rendering company also expressed interest in our byproduct bone and liver solids. Those materials were being applied as a soil amendment, which is a form of secondary reuse. The rendering company is very interested in using the material to make products. We are working out the procedures to allow **reclaim** of the bone and liver solids (approximately **100 tons and 18 tons per year** respectively).

4.5 Departmental Meetings

One of the ***Objectives and Targets*** discussed in last year's report was meeting with individual departments to discuss the EMS, Green Tier, and opportunities for energy reductions and environmental initiatives within their areas. Following is an update on a few of the specific items presented in last year's report:

- During a departmental meeting, an employee noted that our current pallet reclaimer/recycler did not take broken and unusual sized pallets, and they were consequently being disposed of as trash. In response to this observation, efforts were made to find, and ultimately use, a reclaimer/recycler who would use those units. This resulted in approximately **77,000 pounds of broken and unusual sized pallets** being **recycled** in 2017 in lieu of being sent to a landfill for disposal.
- The amount of alcohol used in the Mixing department was discussed during a departmental meeting. This resulted in an evaluation of the alcohol usage and the associated air emissions from that department. As a direct result of that review, changes were implemented which resulted in a **significant (approximately 40%) reduction in total reportable air emissions**. As show in the following graph, there was an associated reduction in calculated emissions following implementation of the changes in September 2017.



- As presented in last year's report, Maintenance personnel noted that cardboard generated in their work area was generally not recycled due to the lack of convenient access to a collection unit. A recycling bin was subsequently dedicated to that area. Maintenance has recycled cardboard throughout the past Green Tier year.

4.6 Other

Additional environmental/sustainability project initiatives include:

- In addition to the previous energy and environmental type projects, Standard Process has had recycling programs in place for paper, cardboard, plastic, glass, metal, print cartridges, batteries, used oil, etc. for over 25 years (for most materials).
- Standard Process continued the long tradition of presenting trees to employees in recognition of Arbor Day again in 2018. It is estimated that over **7,000 trees** have been presented and **planted** since initiation of this program in the 1990's.

- Implementation of a **solar (PV) energy system** to generate electricity at the Farm Headquarters was evaluated and proposed in the 2018 budget. While interest was expressed in this project, it was not approved for this year.

5.0 Conclusion

Standard Process is pleased to have the opportunity to highlight our long tradition of environmental stewardship and sustainability and our continued commitment to the environment and sustainability as part of the DNR Green Tier Program. As presented in this report, we continue to make significant progress with implementation of additional sustainability measures as well as benefitting from our past efforts and commitment.

Through the Green Tier Program, we have reaffirmed our commitment to continuing to move forward with environmental and energy sustainability. This commitment is one of our core Corporate Values (see inside front cover). In addition to providing us with an opportunity to reaffirm our commitment to future environmental excellence and sustainability, our acceptance into, and continued good standing in, the Green Tier Program also validates our commitment to sustainability and the environment as well as recognizes the significant successes of our historical efforts.

Appendix – EMS Audit 2018 Letter of Conformance

Perfect Environmental Performance, LLC.

April 25th, 2018

Mr. Rick Goetz, P.E.
Engineering and Environmental Manager
Standard Process
1200 West Royal Lee Drive
Palmyra, WI 53156

RE: EMS Audit 2018 Letter of Conformance

Dear Mr. Rick Goetz,

Standard Process (SP) is a Company that has voluntarily entered into a program with the Wisconsin Department of Natural Resources (Department) commonly referred to as "The Green Tier Program." The criteria for SP's participation within this program is found in Wisconsin Statute 299.83 (3) and referred to as "Eligibility for Tier I".

Perfect Environmental Performance, LLC (PEP) was retained in January 2018 to perform a "third-year" Environmental Management System (EMS) audit. The intention of the every-third-year external audit requirement is to randomly sample the EMS you implemented and determine whether SP is using it to produce superior environmental performance and whether it incorporates continual improvement.
In 2015 PEP audited your implementation of an EMS and determined it to be functionally equivalent in scope to the ISO 14001:2004 guidance. The SP's EMS continues to be administratively and functionally equivalent to the ISO 14001:2004 EMS implementation guidance. Your EMS was also reviewed to determine if it met the additional Green Tier program requirements which include policy language and annual performance reports among other items.

The audit took place April 18th, 2018 at the SP facility. It included a complete review of the EMS policy and procedures along with a review of selected processes and projects deemed to be superior environmental performance. No major or minor non-conformities were found.

The evidence provided during the EMS audit process demonstrated to PEP that the Standard Process EMS conforms to the "functional equivalency" requirements of ss. 299.83. PEP also found that the EMS continues to be functionally equivalent to ISO 14001:2004, that the EMS is a tool used to produce superior environmental performance and that the EMS incorporates continual improvement.

This document is intended to be submitted to your single point of contact (SPOC) at the Wisconsin Department of Natural Resources and other interested parties as you determine appropriate. It will verify that your implemented EMS continues to be functionally equivalent and has been verified to produce superior environmental performance through its operation. It also confirms that your EMS was audited by an approved (third-party) external auditor.

529 N. Main • Cottage Grove, WI 53527 • Phone: 608.839.0129 • Fax: 608.839.0274 • www.pep-services.com

If you have any questions about this determination please feel free to contact me to discuss them.

Sincerely,

PERFECT ENVIRONMENTAL PERFORMANCE, LLC

Karissa Anderson
Environmental Coordinator, EMS Practice Leader
RABQSA Certificate Number is E4393
tanderson@pep-services.com